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MIKE GRAVINO DIRECTOR 202-604-0747

July 15, 2013

Via ECFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: GN Docket No. 12-268: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions

Dear Ms. Dortch:

The LPTV Spectrum Rights Coalition, (the "LPTV Coalition"), represents a diverse group of over 540 FCC LPTV and TV translator licenses, built stations and construction permits controlled by 69 broadcasting entities in 31 states and DC, which provide 100s of diverse and local channels and national networks reaching more than 60 million viewers.

The LPTV Coalition is in complete agreement with the July 9, 2013 National Association of Broadcasting ("NAB") ex parte notification regarding their request that;

"...the Commission to hold – even perhaps as part of its monthly open agenda meetings – hearings on various aspects of the incentive auction proceeding. A series of hearings on critical incentive auction topics will increase openness and

transparency, provide opportunities for Commissioners and their staffs to hear directly from industry and the public interest community in the same forum, and help further the Commission's goal of an expeditious auction that serves the public interest. While any number of topics would be appropriate for such hearings, NAB in particular urged the Commission to follow the National Broadband Plan's recommendation to inquire further about the impact of the auction on diverse communities."

The LPTV service was authorized in large part to serve diverse communities with innovative programming, and as such, this prime directive will be dramatically impacted by any and all auction activities. While the members of the LPTV Coalition are not eligible for the auction, we are the most dramatically affected class of the television licensees in the auction, and our audiences rely on the diverse networks we provide carriage for, which in turn provide most of the diverse content on television. The 100s of networks which rely on LPTV to reach diverse niche audiences need to be heard from within the context of the spectrum auction process.

The LPTV Coalition further agrees with NAB that since time is of the essence that the above referenced forum be held within the context of the FCC open monthly meeting, preferably in September or October 2013 at the latest.

Respectfully submitted,

Mike Gravino
LPTV Spectrum Rights Coalition
Director